

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO THE UNITED STATES POSTAL SERVICE
(APWU/USPS-9-11)
(February 13, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-9 The August 2011 list of FSS installations shows that there appear to be several sites that are on the September study list that also have FSS equipment.

- a) Please confirm that the following locations contain FSS equipment and are on the September 2011 list of sites being studied for consolidation: South Florida (5 FSS machines), NW Boston (2 FSS machines), Orlando (2 FSS machines), Fox Valley (2 FSS machines), Herb Peck Annex (2 FSS machines), Middlesex Essex (3 FSS machines), Brooklyn (1 FSS machine), Dallas (1 FSS machine) and Stamford CT (1 FSS machine). If this list is not correct please provide the correct list.
- b) If consolidation of these sites is approved, will the FSS equipment be moved or will FSS processing continue at the current location?
- c) If FSS processing will continue at the current location, please confirm that will require continued use of the building including maintenance and utility costs, and continued transportation to and from the building.

APWU/USPS-10 The Hattiesburg MS CSMPC is on the September list of locations being studied for consolidation. On the USPS website (<http://about.usps.com/streamlining-operations/area-mail-processing.htm#h>) there are two AMP feasibility studies related to the Hattiesburg site. One is dated June 28, 2011 evaluating a transfer from Hattiesburg to Gulfport with an estimated savings of \$660,507 and only 5.92% of its First Class Mail volume being downgraded from overnight to 2-day. The second study, dated October 31, 2011, shows savings of \$2.2 million with all First Class Service showing 2-3 day service (but no indication as to what percent is an actual downgrade.) Each is attached for your reference.

- a) What percentage of First Class mail in the October 31 study is actually being downgraded from overnight to 2-day.
- b) Why does the change from 9 positions reduced in the June version to 16 positions reduced in the October version almost triple the employee savings?
- c) What other differences in the assumption underlying these two AMPs account for the difference in the cost savings?

APWU/USPS-11 In her response to NPMHU/USPS-T6-5 witness Martin indicated that the AMP decisions were scheduled to be finalized by mid to late February 2012. However, there are several sites on the September 2011 list of sites to be studied for which there do not appear to have been any public meetings conducted. Are those sites no longer being studied?